

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

Plaintiff,

-vs-

Criminal Action No.  
25-00062-01-CR-W-HFS

TOMAS ALEJANDRO YANEZ FRAIDE,

Defendant.

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**MEMORANDUM OF MATTERS DISCUSSED AND  
ACTION TAKEN AT PRETRIAL CONFERENCE**

The following matters were discussed and action taken during the pretrial conference:

**PENDING CHARGE:**

Count I: Unlawful Re-entry After Removal After An  
Aggravated Felony *in violation of* 8 U.S.C.  
§1326(a) and (b)(2)

Count II: Alien in Possession of a Firearm *in violation of*  
18 U.S.C. §§ 922(g)(5)(A) and 924(a)(8)

Count III: Felon in Possession of a Firearm *in violation of*  
18 U.S.C. §§ 922(g)(1) and 924(a)(8)

**TRIAL COUNSEL:**

Government: Megan Baker

Case Agent: Elizabeth White

Defense: Ronna Holloman-Hughes

**OUTSTANDING MOTIONS:** None

**ANTICIPATED MOTIONS:** None

**TRIAL WITNESSES:**

Government: 3 or less with stipulations; 5 or less without stipulations

Defense: 1 witness, including Defendant who ( ) will  
( ) may  
( x ) will not testify

**TRIAL EXHIBITS:**

Government: 20 exhibits

Defense: 10 exhibits

**DEFENSES:**

- ☒ defense of general denial  
☐ defenses of general denial and \_\_\_\_\_

**POSSIBLE DISPOSITION:**

- ☐ Definitely for trial ☐ Possibly for trial  
☐ Motion to continue to be filed ☒ Likely a plea will be worked out

**TRIAL TIME: 2 days**

Government's case including jury selection: 1.5 - 2 days  
Defense case: .5 day

**STIPULATIONS:** Government: likely to stipulate to prior felony conviction and interstate nexus of the firearm; Defense: takes no position at this time regarding stipulations

**UNUSUAL QUESTIONS OF LAW:** None

**FILING DEADLINES:**

**Witness and Exhibit Lists:**

Government: June 23, 2025  
Defense: June 23, 2025

**Counsel are requested to list witnesses in alphabetical order on their witness list.**

**Exhibit Index, Voir Dire, Jury Instructions:** June 23, 2025

**Jury instructions must comply with Local Rule 51.1**

**Motions in Limine:** June 23, 2025

**TRIAL SETTING:** Criminal jury trial docket commencing 7/7/2025

**Please note:** *Neither the Defense nor the Government has any conflicts with the July 7, 2025, trial docket.*

**OTHER:**

- ☐ A \_\_\_\_\_-speaking interpreter is required.  
☐ Other assistive devices: \_\_\_\_\_

**IT IS SO ORDERED.**

/s/ Jill A. Morris  
JILL A. MORRIS  
United States Magistrate Judge